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12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
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15 ML1 RECORDS, LLC and SAM  
TROCKI,

16 Plaintiffs,

17 vs.

18 TRULY ORIGINAL, LLC; BRAVO  
19 MEDIA LLC; and NBCUNIVERSAL  
MEDIA, LLC

20 Defendants.  
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Case No. 2:22-CV-06015-GW-PVC

**STIPULATION TO EXTEND TIME  
FOR DEFENDANTS TRULY  
ORIGINAL, LLC, BRAVO MEDIA  
LLC, AND NBCUNIVERSAL  
MEDIA, LLC TO RESPOND TO  
COMPLAINT BY NOT MORE  
THAN 30 DAYS (L.R. 8-3)**

Assigned to the Hon. George H. Wu  
Dept.: Courtroom 9D

Complaint Served:  
August 29, 2022 and September 2, 2022

Current Response Dates:  
September 19 and 23, 2022

New Response Date:  
October 19, 2022

Action Filed: August 24, 2022

**STIPULATION**

Plaintiffs ML1 Records, LLC and Sam Trocki (“Plaintiffs”) and Defendants Truly Original, LLC, Bravo Media LLC, and NBCUniversal Media, LLC (“Defendants”), by and through their undersigned counsel, stipulate as follows:

1. On August 24, 2022, Plaintiffs filed the Complaint in this action. Dkt.

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2. On August 29, 2022, Plaintiffs served the Complaint on Defendants Bravo Media LLC and NBCUniversal Media, LLC. Dkts. 14, 15.

3. On September 2, 2022 Plaintiffs served the Complaint on Defendant Truly Original, LLC. Dkt. 16.

4. Defendants Bravo Media LLC and NBCUniversal Media, LLC’s current deadline to file an answer or otherwise respond to the Complaint is September 19, 2022. Defendant Truly Original, LLC’s current deadline to file an answer or otherwise respond to the Complaint is September 23, 2022.

5. On September 7 and 8, 2022, Defendants’ counsel conferred with Plaintiffs’ counsel regarding an extension, and Plaintiffs’ counsel has agreed to extend Defendants Bravo Media LLC and NBCUniversal Media, LLC’s time to answer or otherwise respond to the Complaint by 30 days, and Truly Original, LLC’s time to answer or otherwise respond to the Complaint by 26 days, to October 19, 2022.

6. There have been no prior extensions of time to respond to the Complaint.

7. All signatories listed below, and on whose behalf the filing is submitted, concur in this filing’s content and have authorized this filing.

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1           **NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND**  
2 **AGREE** that Defendants' deadline to respond to Plaintiffs' Complaint is extended  
3 to October 19, 2022.

4           **SO STIPULATED AND JOINTLY SUBMITTED:**

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6 DATED: September 9, 2022

DAVIS WRIGHT TREMAINE LLP  
RACHEL STROM  
SAM F. CATE-GUMPERT

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9 By: /s/ Sam F. Cate-Gumpert  
10 Sam F. Cate-Gumpert  
11 Attorneys for Defendants  
12 TRULY ORIGINAL, LLC, BRAVO  
13 MEDIA LLC, and NBCUNIVERSAL  
14 MEDIA, LLC

15  
16 DATED: September 9, 2022

PHILLIPS, ERLEWINE, GIVEN & CARLIN LLP  
NICHOLAS A. CARLIN  
NINA C. POUGET

17 By: /s/ Nicholas A. Carlin  
18 Nicholas A. Carlin  
19 Attorneys for Plaintiffs  
20 ML1 RECORDS, LLC and SAM  
21 TROCKI

22 I, Sam F. Cate-Gumpert, certify that I received written permission to affix the  
23 electronic signatures from those attorneys whose signatures appear above.

24 /s/ Sam F. Cate-Gumpert  
25 Sam F. Cate-Gumpert